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September 8, 2022

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Ying Sun et al.
21-CR-343 (SHS)

Dear Judge Stein:

I am appointed as counsel to Jian Wang in the above captioned case. I write on behalf of all defendants and the government to request that the Court adjourn the status conference currently scheduled for Monday, September 12 at 2:30 pm. The parties have consulted and have no issues that require the Court's intervention at this time, as plea discussions are ongoing.

We respectfully suggest that a 30-day adjournment would be appropriate and, if the Court grants this request, ask the Court set the case down for a date convenient to the Court in mid-October. The defense consents to the exclusion of time pursuant to the Speedy Trial Act until the next conference date set by the Court.

I thank the Court for its consideration and continued courtesies to counsel.

Respectfully,

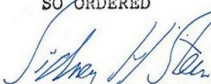
/s/

Richard H. Rosenberg, Esq.

Cc: All counsel of record (via ECF)

The conference is adjourned to October 12 at 11:00 a.m. The time is excluded from calculation under the Speedy Trial Act from today until October 12, 2022. The Court finds that the ends of justice served by this continuance outweigh the best interests of the public and the defendants in a speedy trial pursuant to 18 U.S.C. Sec. 3161(h)(7)(A).

Dated: New York, New York
September 8, 2022

SO ORDERED

SIDNEY H. STEIN
U.S.D.J.